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CLERK U.S. DISTRICT COURT DISTRICT OF ARIZONA	
BY	DEPUTY

Barbara Eileen Grant / 114.192.(1896)
 Name and Prisoner/Booking Number
 Cochise County Jail / cb 13 / 23-24 ha lock up
 Place of Confinement
 203 N Judd Drive
 Mailing Address
 Bisbee AZ 85603
 City, State, Zip Code

(Failure to notify the Court of your change of address may result in dismissal of this action.)

IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF ARIZONA

Barbara Eileen Grant
 (Full Name of Plaintiff)

Plaintiff,

v.

CASE NO. CV-23-454-TUC-RCC(PSOT)
 (To be supplied by the Clerk)

CIVIL RIGHTS COMPLAINT
 BY A PRISONER

(1) Terisha Dawn Briggs
 (Full Name of Defendant)
 Legal Defendants Dir
 (2) Sara L. Dent
 Dir Charles Kendall
 (3) Public Defendants Rodrigo Andrade
 (4) Judge Jason A. Lindstrom
 Defendant(s).

- ☒ Original Complaint
☐ First Amended Complaint
☐ Second Amended Complaint

☒ Check if there are additional Defendants and attach page 1-A listing them.

2nd Complaint to follow
 this 1st Complaint

A. JURISDICTION

1. This Court has jurisdiction over this action pursuant to:

- ☐ 28 U.S.C. § 1343(a); 42 U.S.C. § 1983
☐ 28 U.S.C. § 1331; *Bivens v. Six Unknown Federal Narcotics Agents*, 403 U.S. 388 (1971).
☐ Other:

2. Institution/city where violation occurred:

JP5 Sierra Vista AZ Judge Kelliher
 Div 5 Superior Court Judge Lindstrom
 Cochise County Jail

B. DEFENDANTS

1. Name of first Defendant: Terisha Dawn Driggs. The first Defendant is employed as: Prosec. Atty at Cochise County.
(Position and Title) (Institution)
2. Name of second Defendant: Sara L Dent. The second Defendant is employed as: Legal Defendants Dir Indig. Atty at Cochise County.
(Position and Title) (Institution)
3. Name of third Defendant: Charles Kendall Director. The third Defendant is employed as: Rodrigo Andrade Atty at Cochise County.
(Position and Title) (Institution)
4. Name of fourth Defendant: Judge Jason A. Lindstrom. The fourth Defendant is employed as: Div 5 Superior Court Judge at Cochise County.
(Position and Title) (Institution)

If you name more than four Defendants, answer the questions listed above for each additional Defendant on a separate page.

C. PREVIOUS LAWSUITS

1. Have you filed any other lawsuits while you were a prisoner? ☐ Yes ☒ No
2. If yes, how many lawsuits have you filed? _____. Describe the previous lawsuits:
- a. First prior lawsuit:
1. Parties: _____ v. _____
 2. Court and case number: _____
 3. Result: (Was the case dismissed? Was it appealed? Is it still pending?) _____
- b. Second prior lawsuit:
1. Parties: _____ v. _____
 2. Court and case number: _____
 3. Result: (Was the case dismissed? Was it appealed? Is it still pending?) _____
- c. Third prior lawsuit:
1. Parties: _____ v. _____
 2. Court and case number: _____
 3. Result: (Was the case dismissed? Was it appealed? Is it still pending?) _____

If you filed more than three lawsuits, answer the questions listed above for each additional lawsuit on a separate page.

D. CAUSE OF ACTION**COUNT I**

1. State the constitutional or other federal civil right that was violated: _____

2. **Count I.** Identify the issue involved. Check **only one**. State additional issues in separate counts.

- | | | | |
|--|---|---|---|
| <input type="checkbox"/> Basic necessities | <input type="checkbox"/> Mail | <input type="checkbox"/> Access to the court | <input type="checkbox"/> Medical care |
| <input type="checkbox"/> Disciplinary proceedings | <input type="checkbox"/> Property | <input type="checkbox"/> Exercise of religion | <input checked="" type="checkbox"/> Retaliation |
| <input type="checkbox"/> Excessive force by an officer | <input type="checkbox"/> Threat to safety | <input type="checkbox"/> Other: _____ | |

3. **Supporting Facts.** State as briefly as possible the **FACTS** supporting Count I. Describe exactly what **each Defendant** did or did not do that **violated your rights**. State the facts clearly in your own words without citing legal authority or arguments.

Both defendants Prosecutor Driggs and Sarah L. Dent met with Gantt at her request in order to stop FTA's with no notice to Gantt. Mtng was 12-22-22. Gantt also requested Deputy Tom Fair to be present. The FTA's metastasizing never occurred, because Deputy Fair opened the mtng with the statement: "Gantt has a valid case against Cochise" as liable for the trespass. Instantly Driggs & Dent stated Gantt is going to prison and we are issuing a rule 11. Later Gantt immediately fired Sara Dent as indigantly. At the Div 5 withdrawal w/ Lindstrom 2-10-23: Dent withdrew at the exact same time as she issued the rule 11. All parties are full aware that Gantt is a candidate for 2 Ph.D's with >50 years of advanced university studies. Dent also knew the 20 years of medical records were available to prove no history of mental history/psych symptoms for 68 years. Driggs also knew. Also Judge Lindstrom was informed of Gantt's medical records. Gantt stated on 2-10-23: the rule 11 is vindictive retaliation and has no relevancy to the criminalized civil gate-road dispute.

4. **Injury.** State how you were injured by the actions or inactions of the Defendant(s).

Gantt was not informed of the rule 11 Drappt the 1st or 2nd time. Gantt has been entrapped in jail since 7-10-23. Gantt's truck is abandoned at risk of forfeiture w/ All id's, cell, visa, wallet, Ph. & work inside the vehicle. Leaving Gantt incapacitated, immobilized, and stranded.

5. **Administrative Remedies:** Costing \$1,000's of dollars in losses.

- Are there any administrative remedies (grievance procedures or administrative appeals) available at your institution? in rules manual but refused access. ☒ Yes ☒ No
- Did you submit a request for administrative relief on Count I? ☒ Yes ☐ No
- Did you appeal your request for relief on Count I to the highest level? ☒ Yes ☐ No
- If you did not submit or appeal a request for administrative relief at any level, briefly explain why you did not. three jail forms: inmate req forms; medical forms; Level 1 and Level 2 grievance forms;

COUNT II

1. State the constitutional or other federal civil right that was violated: Judge Jason A Lindstrom refuses All & every attempt of defense in his courtroom & actions.

2. **Count II.** Identify the issue involved. Check **only one**. State additional issues in separate counts.

- | | | | |
|--|---|---|---------------------------------------|
| <input type="checkbox"/> Basic necessities | <input type="checkbox"/> Mail | <input type="checkbox"/> Access to the court | <input type="checkbox"/> Medical care |
| <input type="checkbox"/> Disciplinary proceedings | <input type="checkbox"/> Property | <input type="checkbox"/> Exercise of religion | <input type="checkbox"/> Retaliation |
| <input type="checkbox"/> Excessive force by an officer | <input type="checkbox"/> Threat to safety | <input checked="" type="checkbox"/> Other: <u>All defense absent & denied & refused in J.A. Lindstrom court</u> | |

3. **Supporting Facts.** State as briefly as possible the FACTS supporting Count II. Describe exactly what **each Defendant** did or did not do that violated your rights. State the facts clearly in your own words without citing legal authority or arguments.

Judge Jason A. Lindstrom refuses All & every defense - or - motions - or - requests. Lindstrom notes Gantt in every hearing. Lindstrom refuses All pro se motions by Gantt and by indig or private attys. Lindstrom refuses to quash FTA's - FTE's. Lindstrom refuses to allow Gantt to change attys when indig defense is ineffective. Lindstrom refuses a change in judge for Gantt. Lindstrom refuses to correct the 1st rule 11 Dr's more than 30 errors: such as He and He spoke mostly Spanish. Lindstrom has entrapped Gantt in a fraudulent rule 11 competency restoration since 7-10-23. Lindstrom issues numerous continuances when NO rule 11 Competency program is being utilized nor activated since 7-10-23. Lindstrom bases the repeated continuances on a rule 11 report that has > 30 errors. The Lindstrom judge also refused Gantt to be pro se. Lindstrom set 25K bail on the 2nd FTA based on the accusation that Gantt "refuses to cooperate" with the rule 11. And based on Gantt has a "history" of now 2 FTA's on top of her original CR2022 391 gate Aggravated indictment based on "FEELINGS" of trespass road block gate too difficult to open. Lindstrom stated phone revoked at jail due to leaving msgs for indig attys all over Cochise County and IDC Maria coordinator 520-432-9800 for court Counsel.

4. **Injury.** State how you were injured by the actions or inactions of the Defendant(s).

Entrapped in jail in 23-24 hr lock up. All phone access to an atty is revoked w/ NO documentation or anything. No pen; No paper; No Law Librarp, No inter-office mail; No Comms; No Telemed Crisis Support; No replies from Public Def Pir Kendall Nor atty Rodrigo Andrade.

5. **Administrative Remedies.**

- Are there any administrative remedies (grievance procedures or administrative appeals) available at your institution? ☐ Yes ☒ No
- Did you submit a request for administrative relief on Count II? ☒ Yes ☐ No
- Did you appeal your request for relief on Count II to the highest level? ☒ Yes ☐ No
- If you did not submit or appeal a request for administrative relief at any level, briefly explain why you did not. Thru indig defense; thru inmate request forms; thru medical req forms; thru Level 1 AND Level 2 grievance forms All at Jail.

COUNT III

1. State the constitutional or other federal civil right that was violated; Prosecutor Driggs interfered w/ civil Quiet Title proceedings to remove trespass gate roadblock on Tyleus Trek RE# 11,000 Tyleus Trek SVista 85635
2. **Count III.** Identify the issue involved. Check **only one**. State additional issues in separate counts.
- | | | | |
|--|---|---|---|
| <input type="checkbox"/> Basic necessities | <input type="checkbox"/> Mail | <input type="checkbox"/> Access to the court | <input type="checkbox"/> Medical care |
| <input type="checkbox"/> Disciplinary proceedings | <input type="checkbox"/> Property | <input type="checkbox"/> Exercise of religion | <input checked="" type="checkbox"/> Retaliation |
| <input type="checkbox"/> Excessive force by an officer | <input type="checkbox"/> Threat to safety | <input type="checkbox"/> Other: _____ | |

3. **Supporting Facts.** State as briefly as possible the FACTS supporting Count III. Describe exactly what **each Defendant** did or did not do that violated your rights. State the facts clearly in your own words without citing legal authority or arguments.

Prosecutor Driggs poisoned Gantt's civil atty and Quiet Title civil proceedings to remove a trespass gate to Gantt's home's land. Driggs criminalized a civil case thru a fake 100' injunction. And then issued citations thru deputies accusing Gantt of having a worthless gate roadblock. Driggs called Adult Protective Services to file claiming that the road blockages (29) were Gantt's self negligence. Driggs interfered w/ County Code; County R.O.W; County Surveyor; County Construction Compliance; and County Valid USPS Mail to 11,000 Tyleus Trek SVista 85635; Gantt's final retirement home. Gantt's life services were blocked for 5 years. Driggs offered a Not Guilty All charges dismissed Final Settlement Agreement to try and re-install the gate back into a public subdiv. rdw road; after Gantt removed the gate and All 29 trespasses w/ the previous County Surveyor David S. Hurland; the bulldozer; the re-draw of the deed and the re-title insurance policy which took 500A's from every local title co. who refused to indemnify Cochise County fraud as too much liability; FNT % Barb Stewart NP Tucson, AZ. 1-26-23

4. **Injury.** State how you were injured by the actions or inactions of the Defendant(s). Traumatic stress ailment of bodily panic attacks every 15' causing drenching cold sweats; the heart medicine RX Minipress with Coreq. which jail refuses to supply since 7-10-23

5. **Administrative Remedies.**

- a. Are there any administrative remedies (grievance procedures or administrative appeals) available at your institution? ☒ Yes ☐ No
- b. Did you submit a request for administrative relief on Count III? ☒ Yes ☐ No
- c. Did you appeal your request for relief on Count III to the highest level? ☒ Yes ☐ No
- d. If you did not submit or appeal a request for administrative relief at any level, briefly explain why you did not. Numerous jail inmate forms; Level 1 & Level 2 grievances; and medical forms.

If you assert more than three Counts, answer the questions listed above for each additional Count on a separate page.

E. REQUEST FOR RELIEF

State the relief you are seeking:

Gantt has been arrested 3 times on the same, citN: CR 2022 391.
Gantt Needs information on why 4 misdemeanors? records are
gone or obeisant to rule 11? Gantt needs those 4 misdemeanors
records = an indig atty assigned: Kristian Kamianov 520-887-7816.
Gantt Needs to be compensated for New private atty fees from Knowles
Law % Victor: 602-702-5431. Gantt needs to be paid for wrongful
days in jail Now TL 120 days in 23-24 has lock up. Gantt needs to
be compensated for Abandoned Truck w/ Ph.d office Now ~ @ \$3500
or a total forfeiture of \$33K.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on

9-29-23

DATE

E. Gantt

SIGNATURE OF PLAINTIFF

(Name and title of paralegal, legal assistant, or
other person who helped prepare this complaint)

(Signature of attorney, if any)

(Attorney's address & telephone number)

ADDITIONAL PAGES

All questions must be answered concisely in the proper space on the form. If you need more space, you may attach no more than fifteen additional pages. But the form must be completely filled in to the extent applicable. If you attach additional pages, be sure to identify which section of the complaint is being continued and number all pages.